



April 15, 2011

Mr. Phil Isenberg, Chair  
Delta Stewardship Council  
980 9<sup>th</sup> St. Suite 1500  
Sacramento, CA

Subject: Delta Plan-Levee Risk Management Strategies

Dear Mr. Isenberg and Members:

The Contra Costa Council is a non-profit organization comprised of over 400 employers (private, public and institutional) located within Contra Costa County. The Council researches various topics of public policy and develops advocacy statements and positions that are of particular interest to our members.

Since 2004 our Council has been engaged on the issues facing the Sacramento-San Joaquin Delta. We developed a Statement of Principles in 2007 that has guided our activities for the past 4 years. Those guiding principles have been submitted and used by state leaders, including the Delta Vision process, and subsequent legislation adopted in 2009. We note that essentially all of our principles are now incorporated in the legislative package approved in November 2009, including the formation of the Delta Stewardship Council.

We continue to be engaged with the various implementation activities, including development of the required Delta Plan. Our activities lead us to be concerned about the sustainability and required improvements to the existing levee system that defines the structural framework of the Delta. Levees separate the land from the water and vice-versa. Failure of any levee will have instant and major flooding impacts. Essential state and federal interests include the waterways in that the water is legally determined to be waters of the state and navigable waters for federal regulatory actions. Delta channels are the principal method to control flood routing necessary to avoid flood damage within the watershed. Some land-based infrastructure facilities also serve state and regional interests. In addition to the obvious water supply features, the Delta is a major environmentally protected ecosystem. There is no doubt that the levee system is essential to protect state and federal interests.

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Our Board of Directors on April 15, 2011 adopted a guiding policy regarding Delta levees that supplements the original 2007 Statement of Principles. Our levee position advocates for a 2-prong effort to make strategic investments in improved levee structures and to encourage all entities to become prepared in the event of a levee failure with subsequent flooding damage. We submit for your serious consideration our policy statement and request that you incorporate our policy elements into your own Delta Plan as it is being developed.

We will continue to encourage public and private entities to develop risk management strategies for the Delta, but your efforts to prepare and adopt a Delta Plan is essential for a comprehensive and cohesive strategy affecting the entire 5 county Delta region.

Very truly yours,

Ms. Linda Best  
President and CEO

Cc: Mr. Joe Grindstaff  
Executive Officer

Encl. Levee Risk Management Strategies



## CONTRA COSTA COUNCIL DELTA VISION

### **LEEVE RISK MANAGEMENT STRATEGIES**

*Adopted on April 15, 2011*

On June 15, 2007, the Contra Costa Council adopted a Statement of Principles regarding the Sacramento-San Joaquin Delta (Delta). The Statement of Principles reflects a long-term comprehensive view of the Delta. Our Principles recognize the importance of an existing levee system that defines the land/water interface that is the dominant geographic feature of the Delta. The Statement includes policy goals for protecting people, property and infrastructure from levee failure scenarios and the importance of ongoing capital investments to maintain and improve the existing levee system.

Ongoing assessments of existing Delta levee systems indicate that the levee system is fragile and, while efforts to maintain the levees proceed, levee failure may nonetheless occur with little or no warning, causing flood damage to people, property and essential infrastructure facilities and potentially severely impacting the regional economy and water supply quality. The extent of 1,115 miles of levees, protecting approximately 65 islands and land tracts, raises serious concerns about the capacity of public and private entities to adequately invest in sufficient improvements to the Delta levee system. There are not sufficient funds to create a robust levee system in the immediate future. Existing levees may fail from differing causes that may be localized or catastrophic in nature. Even as efforts to evaluate and repair individual levees proceed, the risk of failure needs to be addressed by public and private entities with existing or future assets within the Delta.

The Contra Costa Council continues to be concerned about achieving a long-term vision for a viable and healthy Delta and continues to endorse the original Statement of Principles. At the same time, to address the risk of levee failure, the Council adopts the following guidance for future advocacy positions for a Levee Risk Management and Emergency Preparedness Strategy. The Strategy includes parallel efforts related to strategic investments to improve the levee system and to provide for disaster preparation activities to protect people/property and vital infrastructure facilities.

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**DELTA LEVEES RISK MANAGEMENT AND  
EMERGENCY PREPAREDNESS POLICY**

The Contra Costa Council supports the following actions in order to lessen consequential damage and economic loss from unavoidable levee failures:

- **Emergency Planning.** Support and encourage ongoing efforts of state and local agencies and public and private owners of critical infrastructure to develop coordinated emergency response plans, including, but not limited to:
  - Encourage state and local agencies within Delta counties to work together;
  - Inventory & locate existing critical or “vital organ” infrastructure systems;
  - Identify safe-havens in flood risk area;
  - Locate physical features on a shared GIS data base;
  - Establish multi-entity information task force;
  - Develop coordinated emergency response activities;
  - Implement advance flood warning systems;
  - Establish safe evacuation routes and shelter locations; and
  - Reserve and locate stockpiles of rock for prompt levee repair.
- **Public Education.** Use multi-media methods to inform public and private stakeholders and decision makers of flood risk,
- **Failure Event Response.** Develop protocols for:
  - Immediate coordinated emergency response to save and recover people/livestock
  - Stabilize flood event to minimize collateral flood damage
  - A comprehensive failure response plan to recover water supplies.
- **Objective and Public Triage Process.** Establish a public process to review emergency response efforts and sequence rebuilding efforts to restore critical infrastructure.
- **Public-Private Partnerships.** Recover and rehabilitate damaged systems by coordinated efforts among public and private entities.
- **Levee Capital Improvement Projects.** Support policies that:
  - Establish essential engineering design and construction criteria that support reasoned expenditures from public and private funding sources;
  - Conform to the Delta Plan;
  - Provide for co-equal goal objectives;

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- Comply with CEQA and NEPA environmental reviews;
  - Satisfy federal FEMA cost reimbursement eligibility requirements;
  - Provide for equitable prioritization of levee projects that will ensure that levees integral to in-Delta beneficial use are addressed, as well as those associated with water supply programs: and
  - Improve reliable protection or relocation of critical infrastructure systems.
- **Beneficiary Pays Principle.** Support the establishment of legal authorities to develop and implement an equitable “beneficiary pays” program.
- **Update Plans.** Review and learn from each flood event and revise emergency preparation plans, as appropriate.